

EXHIBIT 16

EXHIBIT 4

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

THOMAS BURNETT, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:02CV01616
)	Judge Robertson
AL BARAKA INVESTMENT AND)	
DEVELOPMENT CORPORATION, <i>et al.</i>)	
)	
Defendants.)	

**DECLARATION OF MUTAZ SALEH ABU UNUQ,
FINANCIAL DIRECTOR OF THE
WORLD ASSEMBLY OF MUSLIM YOUTH**

IN THE NAME OF GOD, THE MERCIFUL, THE COMPASSIONATE, I,

Mutaz Saleh Abu Unuq, state as follows:

I am the Financial Director of the World Assembly of Muslim Youth ("WAMY"), an international charitable organization based in Riyadh, Kingdom of Saudi Arabia. I have been employed by WAMY for approximately 4 years, and have held my current position for approximately two months. Based on that experience, I have personal knowledge of WAMY's internal operations and charitable activities. The statements made in this declaration are based on that personal knowledge. I understand that this declaration may be submitted to an American court in connection with a lawsuit that has been filed against His Royal Highness Prince Sultan bin Abdulaziz Al-Saud ("Prince Sultan").

2. WAMY was established by Royal Decree in 1972 to achieve the following objectives: (1) to serve the call to Islam among Muslim youth; (2) to reinforce pride in Islam among Muslim youth; (3) to clarify the righteous beliefs that Muslims should espouse; (4) to deepen understanding of Islamic culture among Muslim youth; (5) to clarify the task of young

Muslims in building a Muslim community; (6) to support academic, cultural, and professional organizations and associations that serve Muslim youth; (7) to cooperate and coordinate with organizations that serve Muslim youth; and (8) to sponsor exceptional Muslim students and provide financial and cultural support to them. WAMY is governed principally by its General Assembly and President, who is appointed by the Saudi Government. The current President of WAMY is the Minister of Islamic Affairs in Saudi Arabia. The daily operations of WAMY are supervised by its Secretary General. The Government of Saudi Arabia funds a large portion of WAMY's budget.

3 At the request of Prince Sultan's attorneys, I have conducted a search of WAMY's business records to determine whether WAMY received any donations from Prince Sultan during the period 1994 through September 11, 2001.

4. Based on my search, I have determined that WAMY received no financial donations from Prince Sultan during the relevant time period. WAMY did, however, receive two grants of 100,000 Saudi Riyals each from the Saudi Ministry of Finance upon the recommendation of the Supreme Council for Islamic Affairs, which I understand to be a department of the Saudi Arabian government headed by Prince Sultan. Copies of checks reflecting these donations are attached hereto as Exhibits A and B. In addition, in February 2001, Prince Sultan's Office sent, care of WAMY, a check for US\$ 5,333.33 payable to Mr. Hamad Abdulsalam, which was used to defray the costs of Mr. Abdulsalam's hospitalization. WAMY's records regarding this donation are attached hereto as Exhibit C.

5 All of the grants described above were received in Saudi Arabia.

I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct. Executed on this ____ day of _____, 2003.

[seal of WAMY]

[signature]
Mutaz Saleh Abu Unuq

Notary Public

We certify that Mutaz bin Saleh Abu Unuq appeared before us on this day, Tuesday, Muharram
29, 1424 H, corresponding to 1/4/2003 G and signed this declaration.

Ahmad bin Muhammad bin Abd al-Latif Al Al-Shaykh

[seal of Ministry of Justice]

[signature] [seal of notary public]